

Exhibit B

Thursday, January 24, 2019 at 12:47:02 PM Pacific Standard Time

Subject: RE: Shrem — Stipulation**Date:** Wednesday, January 23, 2019 at 6:06:05 PM Pacific Standard Time**From:** Teresa Huggins**To:** Sam Ferguson, Brian Klein, Donald Pepperman**CC:** Tyler Meade, Seena Forouzan

Sam,

We plan to serve a subpoena for documents on Richard Paukner & Associates, LLC. Will you accept service on behalf of them?

Please let us know by noon tomorrow. In light of fast approaching deposition dates, we need to serve and get responsive documents promptly.

Regarding the proposed stipulation, we need the requested documents for a lot of purposes related to defending our client in this case, and we are not sure that a stipulation can adequately cover all of them. If your firm had been willing to engage in a more meaningful meet and confer process, you'd know this; however, from the start - and even yesterday before we called Chambers - your firm has not wanted to engage in substantive discussions but rather has wanted to barrel ahead with moving to quash. Some of the reasons we need the requested documents include to confirm all wires alleged in the complaint are accurate; to confirm which parties wired the money alleged; to confirm the source of the funds of those wires in case it was on behalf of some other person or entity; to establish the financial and cryptocurrency sophistication of WCF and Cameron and Tyler Winklevoss – in addition to establishing they could cover the alleged loss by paying for allegedly missing bitcoins. All that said, feel free to send us a proposed stipulation and we will be happy to consider it.

Thanks,
Teresa

From: Sam Ferguson <sam@meadefirm.com>**Sent:** Wednesday, January 23, 2019 1:57 PM**To:** Teresa Huggins <thuggins@bakermarquart.com>; Brian Klein <bklein@bakermarquart.com>; Donald Pepperman <Dpepperman@bakermarquart.com>**Cc:** Tyler Meade <tyler@meadefirm.com>; Seena Forouzan <seena@meadefirm.com>**Subject:** Re: Shrem — Stipulation

We would want you to withdraw all of the third-party subpoenas that have been issued.

WCF would stipulate, and we'd be willing to entertain a broader stipulation if you think that is necessary. We don't know exactly the contours of what you are looking for so we can't say who should stipulate. That being said, I'm not sure a stipulation from anyone else would matter given that WCF is the only party, and the only apparent issue is WCF's financial ability to purchase bitcoin.

-Sam

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Sam Ferguson
The Meade Firm p.c.

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From: Teresa Huggins <thuggins@bakermarquart.com>
Date: Wednesday, January 23, 2019 at 12:27 PM
To: Sam Ferguson <sam@meadefirm.com>, Brian Klein <bklein@bakermarquart.com>, Donald Pepperman <Dpepperman@bakermarquart.com>
Cc: Tyler Meade <tyler@meadefirm.com>, Seena Forouzan <seena@meadefirm.com>
Subject: RE: Shrem — Stipulation

Sam,
What parties would sign the proposed stipulation and what subpoenas are you moving to quash?

Thanks,
Teresa

From: Sam Ferguson <sam@meadefirm.com>
Sent: Wednesday, January 23, 2019 10:31 AM
To: Brian Klein <bklein@bakermarquart.com>; Teresa Huggins <thuggins@bakermarquart.com>; Donald Pepperman <Dpepperman@bakermarquart.com>
Cc: Tyler Meade <tyler@meadefirm.com>; Seena Forouzan <seena@meadefirm.com>
Subject: Shrem — Stipulation

Brian, Don, Teresa,

Based on yesterday's call, it seems as though you are pursuing financial discovery for the limited purpose of establishing that WCF had enough assets to purchase bitcoin to cover for the loss caused by Shrem.

We may be amenable to a stipulation on this point if you'd like to propose some language for us to review. In exchange, we'd want you to withdraw the subpoenas, as a stipulation would obviate your stated need for the information.

Let us know if you'd like to hop on a quick call to discuss.

-Sam

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